

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

In Re: Kathy Grim, Debtor(s)	Chapter 13 Bankruptcy Number 20-14285-PMM
---------------------------------	--

**DEBTOR'S ANSWER/REPLY TO TRUSTEE'S MOTION TO DISMISS PURSUANT TO 11  
U.S.C. §1307**

Debtor, Kathy Grim, by and through her attorney, William Hronis, Esquire, files this Answer to the Chapter 13 Trustee's Motion to Dismiss Pursuant to 11 U.S.C. §1307 as follows:

1. Admitted.
2. Admitted.
3. Denied. Specific proof demanded at the time of hearing. At the same time, Debtor listed all contractual payments at the time of filing of the case. Equally important, the Debtor per the Chapter 13 Plan (Docket Entry #17) indicates that she will be surrendering a vehicle. Accordingly, this will also reduce any costs associated with the vehicle in question. Equally important, the Debtor will have a better understanding of her living expenses prior to confirmation. The Debtor will be amending her Schedules to reflect any changes to her income and/or living expenses as information becomes available.

WHEREFORE, Debtor, Kathy Grim, requests that the Trustee's Motion to Dismiss pursuant to 11 U.S.C. §1307 be denied.

Dated: December 15, 2020

Respectfully Submitted,

/s/William Hronis, Esquire

---

William Hronis, Esquire  
609 West Hamilton Street, Suite 18  
Allentown, PA 18101  
(610) 740-1004-Phone  
(610) 740-9357-Fax Number  
[william.hronis@gmail.com](mailto:william.hronis@gmail.com)